

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

In Re:

KENNETH LAWRENCE GROVER,

Debtor.

Case No. 23-40497-BDL

EX PARTE APPLICATION BY
UNITED STATES TRUSTEE FOR *EX*
PARTE ORDER DIRECTING (1) FED.
R. BANKR. P. 2004 EXAMINATION
OF DEBTOR; AND (2) PRODUCTION
OF DOCUMENTS

Acting United States Trustee for Region 18, Gregory M. Garvin (the “U.S. Trustee”), moves the Court pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (“Fed. R. Bankr. P.”) for an ex parte order authorizing the U.S. Trustee to issue subpoenas pursuant to Fed. R. Bankr. P. 9016 to be set on at least 10-days’ notice, directing Keshav Kumar to (1) to appear and be examined under oath and (2) produce documents, at such times and dates as to be set in the subpoenas, and on not fewer than 10-days’ notice. The examination shall continue from the time and date set thereafter day-to-day until it is completed, excluding weekends and holidays. The testimony will be recorded stenographically, through audiovisual means, and/or digitally recorded. The U.S. Trustee requests permission to conduct the examination through Zoom or another online video conferencing platform rather than in person if agreed upon.

The U.S. Trustee believes inquiry into Keshav Kumar’s real property transactions with

1 Kenneth Lawrence Grover (the “Debtor”) is warranted in this case and that the examination and
2 documents requested hereby are necessary for the U.S. Trustee to properly perform his statutory
3 duties in this case.

4 WHEREFORE, the U.S. Trustee respectfully requests that the Court enter an order:

- 5 A. Approving this Application; and
6 B. Authorizing the U.S. Trustee to issue subpoenas to Keshav Kumar directing them to
7 produce documents and appear for examination under oath, pursuant Fed. R. Civ. P.
8 2004 and 9016;
9 C. Allowing any oral examination of Keshav Kumar under oath to proceed remotely,
10 through an online video-conference platform; and
11 D. Granting such other and further relief that the Court deems appropriate.

12 DATED this 7th day of July, 2023

13 Respectfully submitted,

14 GREGORY M. GARVIN
15 Acting U.S. Trustee for Region 18

16 /s/ Matthew J.P. Johnson
17 Matthew J.P. Johnson, WSBA #40476
18 Attorney for United States Trustee
19
20
21
22
23
24
25
26